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STAPLES CONTRACT & COMMERCIAL, LLC

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

STEPHANIE REECE, an individual,
Plaintiff,

vs.

STAPLES CONTRACT &
COMMERCIAL, LLC., a Delaware
Limited Liability Company, and
DOES 1 through 20, inclusive,
Defendants.

CASE NO.: 2:23-cv-00372-JAM-AC

**STIPULATION TO ALLOW TWO
VERY LIMITED AGREED-UPON
DEPOSITIONS TO BE COMPLETED
WITHIN 25 DAYS OF THE
DISCOVERY CUT-OFF DATE
(STILL 6 MONTHS BEFORE TRIAL)
TO PERMIT THE PARTIES TO
EXHAUST PROMISING
SETTLEMENT DISCUSSIONS
(ECF No. 15)**

Complaint Filed: January 26, 2023

1 Plaintiff Stephanie Reece (“Plaintiff”) and defendant Staples Contract &
2 Commercial, LLC (“Staples”) (collectively, the “Parties”), by and through their
3 undersigned counsel, ***hereby inform the Court that they are very close to reaching***
4 ***a settlement***, but which has taken additional time not anticipated due to the
5 unavailability of Staples’ personnel, and therefore, to facilitate a settlement, they
6 respectfully seek the Court’s approval of the following stipulation to allow key
7 limited discovery to be completed in the 25 days following the discovery cut-off
8 date (such that the discovery still will be completed more than six months before
9 the trial date):

10
11 WHEREAS, throughout litigation, the Parties have cooperated in good faith
12 and have worked efficiently to insure that both sides obtain all desired discovery,
13 including agreeing to their previous stipulation to primarily accommodate two non-
14 party witnesses’ schedules and redirect resources and time to settlement, which this
15 Court approved on July 26, 2024;

16
17 WHEREAS, the Parties did not anticipate the additional time needed to
18 advance settlement discussions to a resolution, but represent to this Court that they
19 are very close to a settlement and that the Court similarly approving the requested
20 relief herein from the discovery cut-off date for (i) the second day to complete
21 Plaintiff’s deposition, and (ii) a short two-topic 30(b)(6) deposition will greatly
22 enhance the chance of settlement;

23
24 WHEREAS, the Parties agree that neither will be prejudiced allowing this
25 discovery after the discovery cut-off for the sole purpose of conducting these
26 limited depositions, ***and the Court should have no concerns that it will impact any***
27 ***other date as the Parties are committed to complete the remaining discovery by***
28 ***August 27, 2024, which is more than six months before the trial date.***

1 NOW THEREFORE, and subject to the Court's approval, the Parties
2 stipulate that they may take the following discovery on or before August 27, 2024:

- 3
4 (i) The second day of Plaintiff's deposition necessary to complete it; and
5 (ii) A 30(b)(6) witness designated by Staples for Topics 1 and 2.
6

7 DATED: July 30, 2024

By: /s/Edgar Manukyan

8 EDGAR MANUKYAN

9 Attorneys for Plaintiff
10 STEPHAIN REECE

11 DATED: July 30, 2024

By: /s/Kymberleigh Damron-Hsiao

12 KYMBERLEIGH DAMRON-HSIAO

13 Attorneys for Defendant
14 STAPLES CONTRACT & COMMERCIAL,
15 LLC
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ORDER

The Court, having reviewed the parties' Stipulation to Allow Two Very Limited Agreed-Upon Depositions to be Completed within 25 Days of the Discovery Cut-Off Date (Still 6 Months Before Trial) to Permit the Parties to Exhaust Settlement Discussions, and good cause appearing therefor, hereby **GRANTS** the Parties' joint request and **EXTENDS** the current discovery cut-off date of August 2, 2024, to **August 27, 2024**, for the limited purpose of:

- (iii) The second day of Plaintiff's deposition necessary to complete it; and
- (iv) A 30(b)(6) designated by Staples for Topics 1 and 2.

IT IS SO ORDERED.

Dated: August 06, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE